

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION**

JANE DOE,)	
)	No. 1:17-cv-03688
Plaintiff,)	
v.)	Hon. John Robert Blakey, Judge
)	
HARPERCOLLINS PUBLISHERS LLC and)	
LAURA KIPNIS,)	
)	
Defendants.)	
)	

DEFENDANTS' MOTION TO DISMISS

Defendants Laura Kipnis and HarperCollins Publishers LLC, by and through their undersigned attorneys, respectfully move this Court pursuant to Federal Rule of Civil Procedure 12(b)(6) to issue an order dismissing the Complaint with prejudice.

For the reasons set forth in the accompanying memorandum of law, the Declaration of Matthew E. Kelley and the exhibits thereto, Plaintiff cannot state any plausible claim for relief. Accordingly, Defendants ask that this Court dismiss the Complaint with prejudice.

Dated: July 21, 2017

Respectfully submitted,

Brian A. Sher
Lauren J. Caisman
BRYAN CAVE LLP
161 North Clark Street, Suite 4300
Chicago, IL 60601
Telephone: (312) 602-5000
Facsimile: (312) 602-5050

By: /s/ Lauren J. Caisman
Katherine M. Bolger (*pro hac vice*)
LEVINE SULLIVAN KOCH &
SCHULZ, LLP
321 W. 44th Street, Suite 1000
New York, NY 10036
Telephone: (212) 850-6100
Facsimile: (212) 850-6299

Matthew E. Kelley (*pro hac vice*)
LEVINE SULLIVAN KOCH &
SCHULZ, LLP
1899 L Street NW, Suite 200

Washington, DC 20036
Telephone: (202) 508-1100
Facsimile: (202) 861-9888

*Counsel for Defendants HarperCollins Publishers LLC and
Laura Kipnis*

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of July 2017, a true and correct copy of the above and foregoing was sent via the Court's CM/ECF System to all counsel of record.

/s/ Lauren J. Caisman
Attorney for Defendants